

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

BESTWALL LLC,¹

Debtor.

Chapter 11

Case No. 17-31795

MOTION FOR ADMISSION *PRO HAC VICE* FOR GREGORY M. GORDON

I, Garland S. Cassada, am a partner with the law firm of Robinson, Bradshaw & Hinson, P.A. and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the "Local Bankruptcy Rules") and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Gregory M. Gordon to practice in this Court for the purpose of representing Bestwall LLC, as debtor and debtor in possession (the "Debtor"), in the above-captioned case. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Mr. Gordon is a partner of the law firm of Jones Day, with his office located at 2727 North Harwood Street, Suite 500, Dallas, Texas 75201. Mr. Gordon's telephone number is (214) 220-3939, and his facsimile number is (214) 969-5100. Mr. Gordon's e-mail address is gmgordon@jonesday.com.

2. An application has been filed concurrently herewith requesting the appointment and retention of Jones Day as bankruptcy counsel for the Debtor pursuant to

¹ The last four digits of the Debtor's taxpayer identification number are 5815. The Debtor's address is 100 Peachtree Street, N.W., Atlanta, Georgia 30303.

section 327(a) of title 11 of the United States Code (the "Bankruptcy Code"). A further application has been filed concurrently herewith requesting the appointment and retention of Robinson, Bradshaw & Hinson, P.A. as special counsel for asbestos claim estimation matters and local bankruptcy counsel.

3. As stated in the Declaration of Gregory M. Gordon, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Gordon is a member in good standing of the Bar of the State of Texas and is admitted to practice in the United States District Court for the Northern District of Texas, the United States Courts of Appeal for the Fifth and Eighth Circuits and the United States Supreme Court. Further, as set forth in his Declaration, Mr. Gordon is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules.

4. With reference to all matters incident to this case, Mr. Gordon submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of this chapter 11 case.

5. The \$281.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Gregory M. Gordon to appear before the Court *pro hac vice* in this case.

Dated: November 2, 2017
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada
Garland S. Cassada (NC Bar No. 12352)
David M. Schilli (NC Bar No. 17989)
Andrew W.J. Tarr (NC Bar No. 31827)
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PROPOSED ATTORNEYS FOR DEBTOR
AND DEBTOR IN POSSESSION

Exhibit A

Declaration of Gregory M. Gordon

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

BESTWALL LLC,¹

Debtor.

Chapter 11

Case No. 17-31795

**DECLARATION OF GREGORY M. GORDON
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Gregory M. Gordon, in support of the *Motion for Admission Pro Hac Vice for Gregory M. Gordon* (the "Motion"),² declares as follows:

1. My name is Gregory M. Gordon, and I am a partner with the law firm of Jones Day, with my office located at 2727 North Harwood Street, Suite 500, Dallas, Texas 75201. My telephone number is (214) 220-3939, and my facsimile number is (214) 969-5100. My e-mail address is gmgordon@jonesday.com.

2. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.

3. I am a member in good standing of the Bar of the State of Texas, and I am admitted to practice before the United States District Court for the Northern District of Texas, the United States Courts of Appeal for the Fifth and Eighth Circuits and the United States Supreme Court.

¹ The last four digits of the Debtor's taxpayer identification number are 5815. The Debtor's address is 100 Peachtree Street, N.W., Atlanta, Georgia 30303.

² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

4. I have never been disbarred or suspended in any court where I am admitted to practice.

5. I have not been the subject of disciplinary action by the bar or courts of any state.

6. I am experienced in bankruptcy matters and am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules.

7. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of this chapter 11 case.

8. The law firm of Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 is proposed special counsel for asbestos claim estimation matters and local bankruptcy counsel.

9. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: November 2, 2017

/s/ Gregory M. Gordon
Gregory M. Gordon

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re

BESTWALL LLC,¹
Debtor.

Chapter 11

Case No. 17-31795

**ORDER ALLOWING GREGORY M. GORDON TO
APPEAR AS COUNSEL FOR DEBTOR, PRO HAC VICE**

This matter having come before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the *Motion for Admission Pro Hac Vice for Gregory M. Gordon* (the "Motion") filed by Garland S. Cassada for the admission *pro hac vice* of Gregory M. Gordon, to practice in this Court for the purposes of representing the above-captioned debtor and debtor in possession (the "Debtor") in the above-captioned case as co-counsel together with counsel from the law firm of Robinson,

¹ The last four digits of the Debtor's taxpayer identification number are 5815. The Debtor's address is 100 Peachtree Street, N.W., Atlanta, Georgia 30303.

Bradshaw & Hinson, P.A. who are admitted to practice in this Court; and it appearing to the Court, and the Court so finding, that for good cause shown the Motion should be granted;

NOW, THEREFORE, IT IS HERBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Gregory M. Gordon shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned chapter 11 case.

This Order has been signed electronically.

The Judge's signature and Court's seal appear at the top of the Order.

United States Bankruptcy Court